

OSBORN LAW P.C.

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DATE FILED: <u>7/25/2023</u>

July 24, 2023

VIA ECF

Honorable Katherine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED

Katharine H. Parker
Hon. Katharine H. Parker, U.S.M.J.

7/25/2023

Re: *Tavarez v. Commissioner of Social Security*
Civil Action No. 1:22-cv-09656-KHP

Dear Judge Parker,

We write on behalf of our client, Gloria M. Tavarez, to request an additional five days to file her motion for judgment on the pleadings which is currently due on July 26, 2023 per the Court's June 6, 2023 Order granting Extension for Time to File. This is the plaintiff's third request for an extension.

Counsel needs the additional time due to the Administrative Transcript being 5,500 pages long and the complexity of the record.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her motion for judgment on the pleadings on or before: **July 31, 2023**;
- Defendant to file its response to plaintiff's motion/cross motion on or before: **September 30, 2023**; and
- Plaintiff to file her reply, if any, on or before: **October 21, 2023**.

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Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Candace Marie Brown Casey, Esq. (by ECF)